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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL SHOULD  
BE SEALED RE: REPLY TO SUMMARY  
JUDGMENT AND OPPOSITION TO  
META'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court's Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed, filed in connection with Plaintiffs' Reply to Motion for Partial Summary Judgment and Opposition to Meta's Motion for Partial Summary Judgment. The Motion and accompanying exhibits contain material that Defendant Meta Platforms, Inc. ("Meta"), as well as third parties HarperCollins Publishers ("HarperCollins") and Hachette Book Group ("Hachette") have designated as "Confidential," "Highly Confidential - Attorneys Eyes Only" and "Highly Confidential – Source Code" as defined in the in the parties' Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the "Protective Order").

PLAINTIFFS' OPPOSITION AND REPLY		
Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Reply to Motion for Partial Summary Judgment and Opposition to Meta's Motion for Partial Summary Judgement	Highlighted Portions	Refers to material designated by Meta, HarperCollins, and Hachette as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 97	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 98	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 99	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 100	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 101	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 102	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"

Exhibit 103	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 104	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 105	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
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Exhibit 111	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 112	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 113	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 114	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 115	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 116	Full Document	Designated by Meta as “Confidential”
Exhibit 117	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 118	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 119	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Exhibit 120	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 121	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 122	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
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Exhibit 134	Full Document	Designated by Hachette as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 135	Full Document	Designated by HarperCollins as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 136	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"
Exhibit 137	Full Document	Designated by Meta as "Highly Confidential – Attorneys' Eyes Only"

Exhibit 138	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 139	Full Document	Designated by HarperCollins as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 140	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 141	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
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Exhibit 143	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 144	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit 146	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Source Code”
Exhibit 147	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only” and “Highly Confidential – Source Code”
Exhibit 148	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
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Exhibit 163	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

<b>BUTTERICK DECLARATION</b>		
Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Declaration of Matthew Butterick in Support of Plaintiffs’ Brief	Highlighted Portions	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit A	Full Document	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit B	Full Document	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Plaintiffs provisionally file the above-referenced documents under seal subject to the Designating Parties’ forthcoming sealing motions. Plaintiffs assert no confidentiality of their own over these documents and are prepared to file them publicly.

Dated: April 7, 2025

By: /s/ Maxwell V. Pritt  
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